

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KONINKLIJKE PHILIPS N.V.,

Plaintiff,

v.

TELIT WIRELESS SOLUTIONS,
INC., TELIT COMMUNICATIONS
PLC,

Defendant.

C.A. No.: 20-1708-CFC

**DECLARATION OF LUCAS I. SILVA IN SUPPORT OF
PLAINTIFF'S REPLY IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT**

Of Counsel:

Eley O. Thompson (*pro hac
vice*)

FOLEY & LARDNER LLP
321 N. Clark Street
Suite 2800
Chicago, IL 60654-5313
Phone: (312) 832-4359
Fax: (312) 832-4700
ethompson@foley.com

Kevin Littman (*pro hac vice*)

Lucas I. Silva (*pro hac vice*)
FOLEY & LARDNER LLP
111 Huntington Avenue
Suite 2500
Boston, MA 02199-7610
Phone: (617) 342-4000
Fax: (617) 342-4001

YOUNG CONAWAY
STARGATT & TAYLOR, LLP
Adam W. Poff (No. 3990)
Robert M. Vrana (No. 5666)
Alexis N. Stombaugh (No. 6702)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Phone: (302) 571-6600
apoff@ycst.com
rvrana@ycst.com
astombaugh@ycst.com

Attorneys for Plaintiff
KONINKLIJKE PHILIPS N.V.

klittman@foley.com lsilva@foley.com	Dated: October 18, 2023
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**DECLARATION OF LUCAS I. SILVA IN SUPPORT OF
PLAINTIFF’S REPLY IN SUPPORT OF MOTION FOR
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I, Lucas I. Silva, declare as follows:

1. I am an attorney at Foley & Lardner LLP, counsel to Plaintiff Koninklijke Philips N.V. (“Philips”).
2. I make this declaration in support of Plaintiff’s Reply In Support of Motion For Summary Judgment.
3. I have personal knowledge of the facts set forth herein and, if called to testify in this matter, could and would testify to the following facts.
4. Attached as **Exhibit 93** is a true and correct copy Sur-Reply Expert Report of Dr. Bertram Huber, dated June 29, 2023.

5. Attached as **Exhibit 94** is a true and correct copy of excerpts from the deposition transcript of Matthias Schneider in this case, dated July 19, 2023.

6. Attached as **Exhibit 95** is a true and correct copy of H       Laffere's Report on Essential IPRs declared in relation to the work of SMG#24, Bates Nos. KPNV0047665 – KPVN0047685, dated December 15, 1997.

7. Attached as **Exhibit 96** is a true and correct copy of H       Laffere's Report on Essential IPRs declared in relation to the work of SMG#24, Bates Nos. KPNV0044954 – KPVN0044963, dated May 1, 1998.

8. Attached as **Exhibit 97** is a true and correct copy of excerpts from Jean-S  bastien Borghetti's Deposition Ex. 7 in this case, FRAND Licensing Levels Under EU Law, Bates Nos. TELIT1708_020856 and TELIT1708_020885 - TELIT1708_020886.

9. Attached as **Exhibit 98** is a true and correct copy of excerpts from the deposition transcript of Richard Buttrick in this case, dated January 24, 2023.

10. Attached as **Exhibit 99** is a true and correct copy of excerpts from the deposition transcript of Jean-S  bastien Borghetti in this case, dated June 26, 2023.

11. Attached as **Exhibit 100** is a true and correct copy of excerpts from Evolved Cellular Network Planning and Optimization for UMTS and LTE, Bates No. TELIT1708_019899 - TELIT1708_019938, dated 2011, which was attached as Exhibit 175 to the Expert Report of Dr. Paul Min dated March 10, 2023.

12. Attached as **Exhibit 101** is a true and correct copy of page 4 of the Witness Statement of Kevin Scott (CX-2401-C) in *Certain UMTS and LTE Cellular Communications Modules and Products Containing the Same*, Inv. No. 337-TA-1240, dated August 20, 2021.

13. Attached as **Exhibit 102** is a true and correct copy of 3GPP Portal – Releases, Bates Nos. KPNV0038441 - KPNV0038442, located at <https://portal.3gpp.org/Releases.aspx>, as of December 21, 2022.

14. Attached as **Exhibit 103** is a true and correct copy of “About ICOM France” from <https://www.icom-france.com/en/>.

Date: October 18, 2023

/s/ Lucas I. Silva
Lucas I. Silva